

REMARKS

By this Amendment, claims 1, 3-5, 9-12 and 14 are amended, claim 16 is newly added, and claims 2 and 6 are canceled without prejudice or disclaimer to the subject matter therein. Support for newly added claim 16 may be found, for example, in FIGS. 2, 14 and 16 of the application. No new matter has been added. Accordingly, after entry of this Amendment, claims 1, 3-5, and 7-16 will remain pending in the patent application. Reconsideration and allowance of the present patent application based on the foregoing amendments and following remarks are respectfully requested.

In the Office Action, claims 2, 4, 6, 9-10, 12 and 14 were objected to for various informalities. In response, claims 4, 9-10, 12 and 14 have been amended in the manner suggested by the Examiner. Claims 2 and 6 have been canceled without prejudice or disclaimer, thus rendering the objection to claim 6 moot. Accordingly, reconsideration and withdrawal of the objection to claims 2, 4, 6, 9-10, 12 and 14 are respectfully requested.

Claims 5-8 were rejected under 35 U.S.C. §102(e) based on Choi (U.S. Pat. No. 6,684,264). The rejection is respectfully traversed.

Claim 6 has been canceled without prejudice or disclaimer, thus rendering the rejection of claim 6 moot.

Claim 5 is patentable over Choi at least because this claim recites a display apparatus of an injection molding machine, which functions as a human-machine interface, wherein, *inter alia*, the display screen of the display apparatus is divided into two or more sections that are arranged to be simultaneously readable, one of these two or more sections being used as a display screen to display text information. Choi does not disclose, teach or suggest a display apparatus including this feature. Therefore, Choi does not disclose, teach or suggest each and every feature recited by claim 5 and, as a result, cannot anticipate claim 5.

Choi discloses an injection molding system architecture including a control panel that is used by an operator to input control data and to view process feedback information. (See col. 4, lines 1-3 and FIGS. 1A-B). Choi further discloses that the control panel displays rows of pushbuttons and multiple tabs (identified as the two or more sections by the Examiner). (See FIG. 8). However, Choi is completely silent about a control panel that is divided into two or more sections that are arranged to be simultaneously readable, one of these two or more sections being used as a display screen to display text information. In Choi, the tabs can only be selected one at a time and the display of one of them impairs the display of the

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remaining ones. As conceded by the Examiner on paragraph 6 of the Office Action, the pushbuttons are merely used to bring up information. Therefore, the windows displayed on the control panel are not simultaneously readable. Furthermore, Applicants respectfully submit that none of the tabs or pushbuttons of the control panel constitutes a section that displays text information created and transferred through a network. Applicants note that FIG. 7 merely discloses the label of each button. These labels are not text information created and transferred through a network.

Claims 7-8 are patentable over Choi for at least the same reasons provided above in connection with claim 5 and for the additional features recited therein. For example, with respect to claim 7, Choi is completely silent about a display apparatus wherein, *inter alia*, the display screen to display text information is used also as a selector button display screen. The Examiner alleged that FIG. 7 discloses this feature. Applicants respectfully disagree and note that FIG. 7 merely discloses the label of each button. However, as noted previously, these labels are not text information created and transferred through a network.

Accordingly, reconsideration and withdrawal of the rejection of claims 5, 7 and 8 under 35 U.S.C. §102(e) based on Choi are respectfully requested.

Claims 1-4 were rejected under 35 U.S.C. §103(a) based on Choi in view of Zvonar (U.S. Pat. No. 5,548,535). The rejection is respectfully traversed.

Claim 2 has been canceled without prejudice or disclaimer, thus rendering moot the rejection of claim 2.

As conceded on page 7 of the Office Action, Choi fails to disclose, teach or suggest a display apparatus comprising, *inter alia*, an instruction unit which instructs to display the text information; and a display control means which displays the electronic text information stored in the memory of the display screen according to the instruction from the instruction unit. However, Applicants respectfully submit that there are additional features that are absent in Choi. For example, and as mentioned previously, Choi fails to disclose, teach or suggest a display apparatus wherein the display screen of the display apparatus is divided into two or more sections that are arranged to be simultaneously readable, one of these two or more sections being used to display text information.

Zvonar fails to remedy the deficiencies of Choi. Zvonar merely discloses a VAX-based menu-driven program that is used to schedule and track performance of periodic activities with respect to various entities. However, Zvonar is completely silent about a display screen that is divided into two or more sections that are arranged to be simultaneously

readable, one of these two or more sections being used to display text information. Therefore, the combination of Choi and Zvonar cannot result, in any way, in the invention of claim 1.

Furthermore, Applicants respectfully submit that it would not have been obvious to combine Choi with Zvonar because these references teach away from each other. (See MPEP 2143). Choi teaches improving control of the machine by using graphics and icons. Choi discloses that the graphical interface provides the flexibility and functions to present information in a simple, more direct manner than other existing control systems. (See col. 7, line 67 and col. 8, lines 1-7). By contrast, Zvonar teaches using VAX text messages to track the performance of the equipment. Therefore, Choi clearly teaches away from Zvonar's system. As a result, Applicants respectfully submit that it would not have been obvious to combine these references. For at least this reason, claim 1 is patentable.

Claims 3 and 4 are patentable over Choi, Zvonar or a combination thereof by virtue of their dependency from claim 1 and for the additional features recited therein. For example, with respect to claim 3, Choi, Zvonar, or a combination thereof fail to disclose, teach or suggest a display apparatus wherein, *inter alia*, the display screen to display text information is used also as a selector button display screen.

Accordingly, reconsideration and withdrawal of the rejection of claims 1, 3 and 4 under 35 U.S.C. §103(a) based on Choi in view of Zvonar are respectfully requested.

Claims 9-15 were rejected under 35 U.S.C. §103(a) based on Choi in view of Zvonar and further in view of Fennell (U.S. Pat. No. 5,430,436). Applicants respectfully traverse the rejection because there is no motivation or suggestion to combine the teachings of these references.

The Office Action states that claims 9 and 13 include the features of claim 1 and some additional features. The Office Action, on page 8, alleges that the combination of Choi and Zvonar makes obvious all of the limitations of claim 1. However, the Examiner has provided no motivation or suggestion for such a determination. Accordingly, the Examiner is respectfully requested to provide the required motivation or suggestion or withdraw the rejection. (See MPEP 2143).

Furthermore, Applicants respectfully submit that it is improper to combine Choi with Zvonar because these references teach away from each other. As discussed above in connection with claim 1, Choi teaches improving control of the machine by using graphics and icons whereas Zvonar teaches using VAX text messages to track the performance of the

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equipment. Because Choi specifically discloses that use of graphics is a superior method for operating the equipment, Choi clearly teaches away from conventional methods using text messages or reports as disclosed in Zvonar. For at least this reason, Applicants respectfully submit that there is no motivation or suggestion to combine Choi with Zvonar.

The Examiner relied on Fennell as allegedly teaching a character input panel which is displayed in the display apparatus when the create key is operated, the character input panel having a character key to input characters and a display time key to set a display time. The Examiner then stated it would have been obvious to one of ordinary skill in the art to combine the teachings of Choi, Zvonar and Fennell. Applicants respectfully disagree. Fennell merely relates to selective call radio receivers but does not teach or suggest anything related to equipment control. Furthermore, Fennell and Choi relate to different/separate arts as evidenced by their different classification. Because Fennell is outside the pertinent field of endeavor, it would not have been obvious to combine Choi and Fennell. (See MPEP 2141.01(a)). Additionally, Fennell does not disclose, teach or suggest the deficiencies identified in the combination of Choi and Zvonar, discussed above. Therefore, for at least this reason, Applicants respectfully submit that the Examiner has not established a *prima facie* case of obviousness that would render obvious claims 9-15.

Accordingly, reconsideration and withdrawal of the rejection of claims 9-15 under 35 U.S.C. §103(a) based on Choi in view of Zvonar and further in view of Fennell are respectfully requested.


Claim 16 is newly added and recites additional features that are novel and non-obvious over the cited references.

Applicants have addressed all the Examiner's rejections and objection and respectfully submit that the application is in condition for allowance. A notice to that effect is earnestly solicited.

If any point remains in issue which the Examiner feels may be best resolved through a personal or telephone interview, please contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,  
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